FINAL

OPERATION AND MAINTENANCE PLAN

TRANSMITTAL DOCUMENT NO. 53.1

RSR Corporation Superfund Site Operable Unit No. 5 Subareas 2, 3 and 4 Dallas, Texas

December 16, 2003

ENTACT

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1.0 INTRODUCTION

This Operation and Maintenance Plan (O&M Plan) has been prepared on behalf of the RSR Corporation for the RSR Corporation Superfund Site, Operable Unit No. 5, Subareas 2, 3 and 4 (RSR OU5 Site). This Plan has been prepared to supplement the Final Remedial Action Report for remedial action activities conducted at the RSR OU5 Site and to comply with the requirements of the Consent Decree lodged between the U.S. EPA and the RSR Corporation on July 21, 2003.

This O&M Plan describes the following elements:

- Objective;
- Site location and description;
- Site history;
- Summary of remedial action activities;
- Subarea 2 operation and maintenance activities, including inspection, maintenance, closure of the existing monitoring well, and corrective action;
- Subarea 3 operation and maintenance activities, including closure of the existing monitoring wells; and
- Example inspection record form.

1.1 Objective

This O&M Plan describes the measures required to maintain the effectiveness of the completed remedial action activities. This effectiveness will be accomplished through a scheduled process of maintenance, inspections and corrective action, if necessary.

1.2 Site Location and Description

The RSR Corporation Superfund Site is located in Dallas, Texas and encompasses an area approximately 13.6 miles in size. The Site is divided into five operable units: OU1 comprises the privately owned residential property; OU2 comprises the Dallas Housing Authority public housing development; OU3 comprises the former landfills and smelter waste disposal areas; OU4 comprises the secondary lead smelter property; and OU5 comprises the battery breaking facility and other industrial properties. OU5 is the subject of this O&M Plan and consists of the industrial property located across the street from the former secondary lead smelter (OU4). OU5 is divided into four Subareas. The remedial and O&M activities cover Subareas 2, 3 and 4 of OU5.

Subarea 2 consists of approximately 23 acres of land bounded on the east by Westmoreland Road, on the north and west by a railroad track, and on the south by La Reunion Parkway. Located within Subarea 2 is a landfill that covers approximately 12 acres. Materials found within the landfill include shredded car parts, slag, battery chips, municipal waste, and other industrial waste materials. Subarea 3 consists of approximately 12 acres of land located south of La Reunion Parkway. Approximately one acre of the 12-acre lot will be addressed during the RA. Subarea 4A is located at the southwest corner of Singleton Boulevard and Westmoreland Road and consists of approximately one acre. Two additional properties (4B and 4C) located adjacent to and west of 4A, consisting of approximately 5 acres, were identified by the RSR Corporation as OU5 associated properties. These additional properties have been voluntarily

included in the OU5 RA. The general location of Subareas 2, 3 and 4 of OU5 are shown on Figure 1. The layout of each subarea is shown on Figure 2.

1.3 Site History

A number of activities were conducted at OU5 in support of operation of the secondary lead smelter located across Westmoreland Road in OU4. Among other things, batteries were disassembled at the battery breaking facility located in OU5 using hammer mills to break the batteries into small pieces. The lead posts and grids were then sent across the street to the smelter facility to produce soft pure lead or specialty alloys. Vehicle maintenance and waste handling and disposal activities, including operation of a surface impoundment, landfill and other slag burial areas occurred at OU5.

OUs 4 and 5 were the subject of several inspections, investigations and removal actions by the U.S. Environmental Protection Agency (EPA) from 1991 to 1995. As a result of the inspections, investigations, and removal actions, the RSR Site was proposed as an addition to the National Priorities List (NPL) of Superfund Sites on May 10, 1993. On September 29, 1995, the RSR Corporation Superfund Site was finalized on the NPL. U.S. EPA conducted a remedial investigation/feasibility study (RI/FS) for OUs 4 and 5 in March 1995 and signed the Record of Decision (ROD) for OU5 on April 3, 199. U.S. EPA and the RSR Corporation entered into a Consent Decree on July 21, 2003 for the performance of remedial work at the RSR OU5 Site. Additional site history is described in the RD/RA Workplan.

1.4 Remedial Action Activities

The purpose of the remedial action at the RSR OU5 Site was to eliminate or minimize the threat of exposure to lead, arsenic, antimony, and other contaminants through direct contact, inhalation and ingestion by on-site containment of the contamination. The major remedial action activities at the RSR OU5 Site consisted of the following:

- Delineation of the limits of the existing landfill and the impacted areas in Subarea 2;
- Surface preparation of Subarea 2, including clearing, grubbing, grading, and contouring the existing landfill;
- Investigation of the impacted areas in Subareas 3, 4A, 4B, and 4C;
- Excavation of impacted soils in Subareas 4A and 4B;
- Restoration of Subareas 4A and 4B;
- Consolidation, grading and compaction of excavated soils in Subarea 2; and
- Installation of the final cover in Subarea 2.

Based on the investigation and delineation activities, impacted soils in Subarea 2 with total lead, arsenic and antimony concentrations that exceeded the remedial action goals for Subarea 2 were consolidated in the landfill or northern impacted area and covered with 2-feet of clay and 3 inches of topsoil (see Figure 2). Impacted soils in Subarea 4 with total lead and arsenic concentrations that exceeded the remedial action goals for Subarea 4 were removed and consolidated within the Subarea 2 landfill. Soils in Subarea 3 were not found to be impacted and the Subarea 3 remedial action goals for total lead and arsenic were not exceeded. In conclusion, the RSR OU5 Site was remediated to meet the remedial action goals developed for commercial/industrial land use.

Operation and maintenance activities for Subareas 4A, 4B, and 4C are not required. An institutional control in the form of a deed restriction will be placed on these properties to ensure the future land use remains commercial/industrial.

2.0 SUBAREA 2 OPERATION AND MAINTENANCE ACTIVITIES

Operation and maintenance activities associated with Subarea 2 will consist of the inspection and maintenance of the cover system placed on the existing landfill and the northern impacted area. In addition, deed restriction of the property for the maintenance of the cover system and future property use for commercial/industrial purposes will be filed.

2.1 Inspections and Maintenance

Inspections of Subarea 2 of the RSR OU5 Site will involve the evaluation of the integrity of the cover. The inspections will be scheduled for a minimum of one per quarter for the first year and annually thereafter with additional inspections to be conducted after major storm events or flood conditions. If a deficiency is identified during the inspection which poses a risk to the integrity of the cover, then corrective actions will be implemented. The inspection record form in Appendix A will be used to record each inspection event, and any required corrective action.

2.1.1 Cover

The soil cover will be inspected for signs of erosion, subsidence, loss of grass vegetation, including bare spots, animal burrows or other conditions that may compromise the cover integrity. The condition of the vegetative cover will be evaluated and corrective actions implemented where necessary. Maintenance of the vegetative cover will include mowing, watering and re-seeding on an as needed basis.

2.1.2 Fence

The condition of the perimeter fence and gate system will be inspected for signs of damage, loose posts, operational gates, and locks, where needed. The base of the fence area will be inspected for erosion, which may result in space beneath the fence large enough for the passage of animals or humans. Hinges and locks, where needed, will be checked for signs of wear or breakage.

2.2 Corrective Action

Corrective action will be implemented when any of the above conditions are noted during an inspection. Corrective action will be taken within 30 days of discovery. The following corrective actions may be implemented:

Problem	Corrective Action
Fence cut or fencepost damaged.	Repair or replace section of fence.
Erosion space under fence.	Fill with soil and/or riprap and/or add fence patch to bottom.
Hinges or gate locks broken.	Replace or repair broken item.
Settlement or subsidence of cover.	Regrade and revegetate problem area.
Erosion of topsoil cover.	Add topsoil, regrade and establish vegetation.
Loss of vegetative cover.	Reseed, fertilize and water, as necessary, to re-establish.

2.3 Closure of Existing Monitoring Well

The monitoring well present in the southwestern portion of the landfill that was installed as part of the remedial investigation will be closed within the first year of O&M activities. The monitoring well will be plugged and abandoned pursuant to the requirements of Chapter 76.1004, Technical Requirements – Standards for Capping and Plugging of Wells and Plugging Wells that Penetrate Undesirable Water or

Constituent Zones, of the Texas Water Well Drillers and Pump Installers Administrative Rules. A record of the monitoring well closure will be submitted to U.S. EPA for documentation purposes. The location of the monitoring well is depicted on Figure 2.

2.4 Deed Restriction

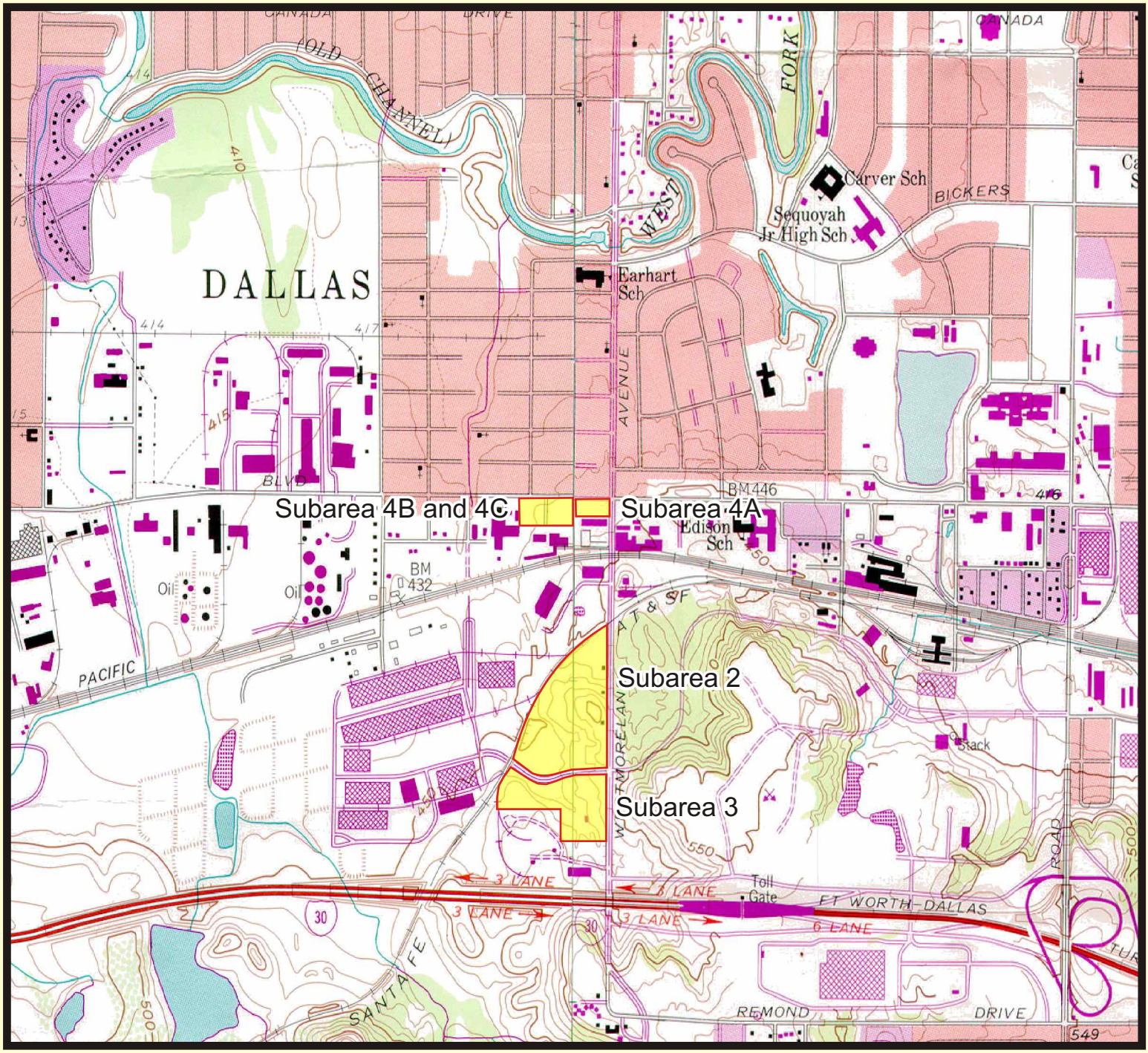
The locations of the cover system for the existing landfill and the northern impacted area will be recorded on the deed notice for the Subarea 2 property. A restriction will be placed on the deed which notes that the cover systems placed on the landfill and the northern impacted area must be maintained during all future uses of the property. The restriction will also state that future development plans for Subarea 2 should be reviewed and concurred by the U.S. EPA to ensure that the remedy continues to be protective of human health and the environment. The property will also be restricted to commercial/industrial use.

3.0 SUBAREA 3 OPERATION AND MAINTENANCE ACTIVITIES

3.1 Closure of Existing Monitoring Wells

The 3 monitoring wells present in the central portion of Subarea 3 that were installed as part of the remedial investigation will be closed within the first year of O&M activities. The monitoring wells will be plugged and abandoned pursuant to the requirements of Chapter 76.1004, Technical Requirements – Standards for Capping and Plugging of Wells and Plugging Wells that Penetrate Undesirable Water or Constituent Zones, of the Texas Water Well Drillers and Pump Installers Administrative Rules. A record of the monitoring well closures will be submitted to U.S. EPA for documentation purposes. The locations of the monitoring wells are depicted on Figure 2.

FIGURES



After U.S.G.S. 7.5 Minute Topographic Quadrangle, Oak Cliff, Texas, 1958, Photo Revised 1981, Contour Interval 10 Feet

Scale
0 ½ 1 mile

N

Texas

Quadrangle Location

FIGURE TITLE:	General Site Location Map	**SITE NAME:**	RSR Superfund Site OU5 Subareas 2, 3 and 4
DOCUMENT TITLE:	Operation and Maintenance Plan	**LOCATION:**	Dallas, Texas

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4040 West Royal Lane, Suite 136
Irving, Texas 75063
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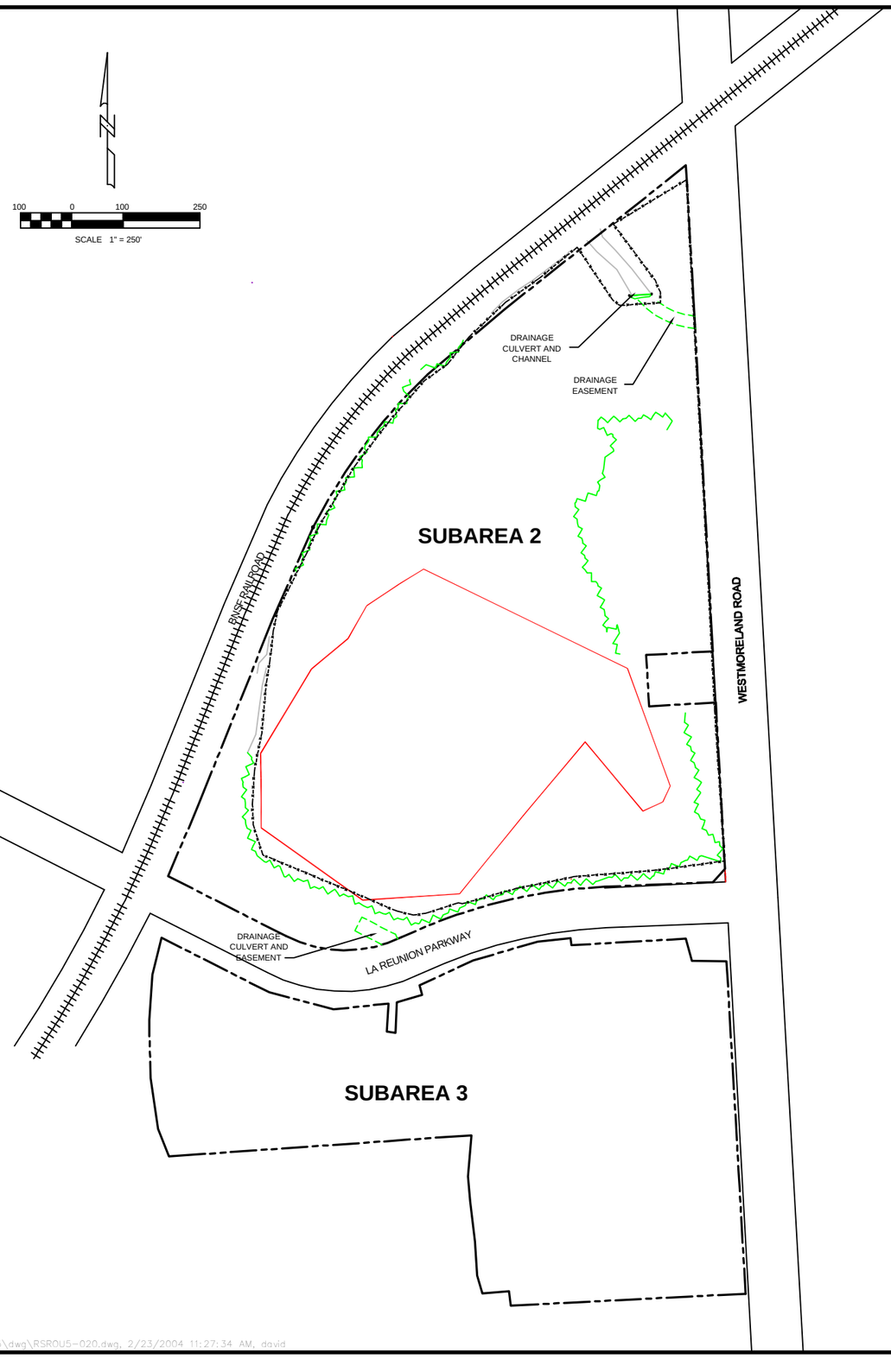
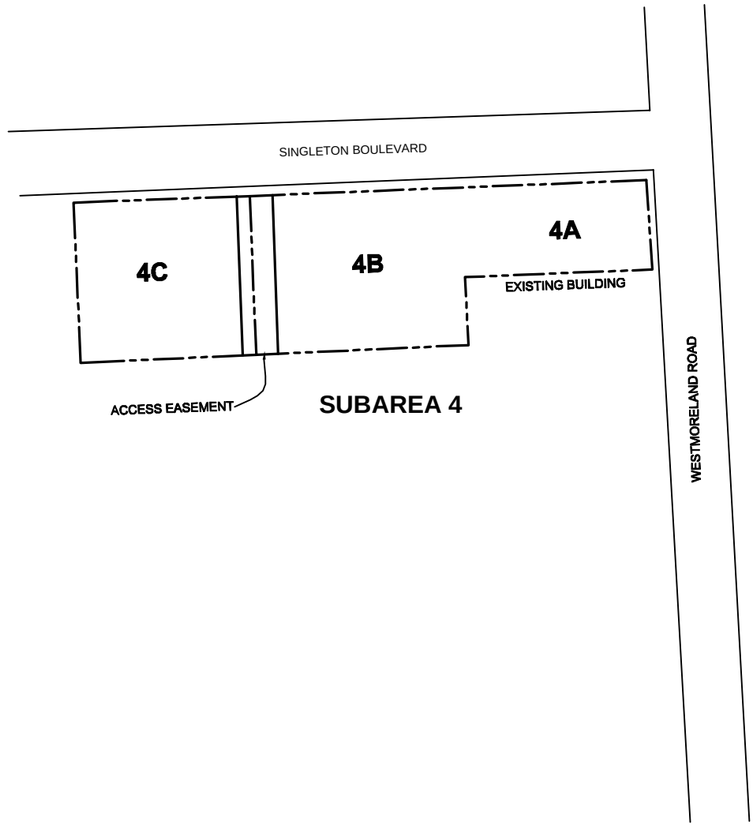
DATE:	12/03	**PREPARED BY:**	DM
SCALE:	As Shown	**CHECKED BY:**	JE
PROJECT NO:	D959	**FIGURE NO:**	Figure 1





L E G E N D

- PROPERTY BOUNDARY
- LANDFILL LIMIT
- TREE LINE
- FENCE

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NO.	DATE	REVISION	Drawn By:	Checked By:	Date:
			DM	DM	12/2003

APP.

Scale: 1"=250'

RSR CORPORATION

FIGURE 2

SITE LAYOUT MAP
RSR CORPORATION SUPERFUND SITE
SUBAREAS 2, 3 AND 4 OF OPERABLE UNIT 5

APPENDIX A

POST-REMEDIAL ACTION INSPECTION RECORD FORM

POST-REMEDIAL ACTION INSPECTION RECORD FORM

RSR Corporation Superfund Site
Operable Unit No. 5, Subareas 2, 3 and 4

Inspection Date: _____ Subarea No.: _____
Inspector's Name: _____ Time: _____
Inspector's Signature: _____ Company: _____

INSPECTION ITEM	INSPECTION FREQUENCY	POSSIBLE ERROR, MALFUNCTION, OR DETERIORATION	STATUS		
			ACCEPTABLE	UNACCEPTABLE	
				Required Corrective Action	Date Corrective Action Completed
Fencing	Quarterly for the first year and annually thereafter	* Damaged, broken or loose fencepost			
		* Loose or broken wire			
		* Damaged fence			
		* Damaged gate			
		* Inoperable locks			
Cover	Quarterly for the first year and annually thereafter	* Settlement or subsidence			
		* Indicators of damage or erosion of cover			
		* Erosion or undercutting perimeters			
		* Loss of Vegetation			
Comments and Description of Corrective Action:					